

FILED

February 8, 2021

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To: U.S. District Court, Western District of Oklahoma

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY , DEPUTY

10th Circuit Court of Appeals Denver Colorado

From: Joseph Maldonado-Passage

Re: **Motion for Leave to file brief on the Court's denial of Defendant's Motion to Sever Counts. Case No. 20-6010 On appeal from the District Court No. 5:18-cr-00227-SLP**

Dear Justices:

I was sentenced on January 22, 2020 and was given the opportunity to file an appeal. My attorney on record for my appeal is Brandon Sample and I need the court to understand that my Constitutional Rights of Due Process has be grossly violated during my appeal process and I am asking the court to allow my legal council to add an additional issue to my appeal the my Murder for Hire case be severed from my Wildlife Charges as I didn't have any wildlife charges until I refused to plead guilty to the bogus Murder for Hire charge then my indictment was superceated with 20 wildlife charges as punishment by the Government for asking for a trial.

I do not know or understand why the Judge's ruling denying a severance has not been appealed to this Court. I was not aware that the issue had been preserved for appeal and is the most important issue in my case.

During this past year, I was in Grady County Federal Hold over until March 25, 2020 and not allowed to have met my appeal attorney. Then I was been transferred to the Federal Medical Center in Fort Worth Texas where the warden kept me in the SHU for the next 4 months with only 1 phone call a month allowed and no visits from my attorneys nor my family due to he just didn't want me at this facility due to all the press, and my mail was withheld for two months at a time making it impossible to communicate with my legal team.

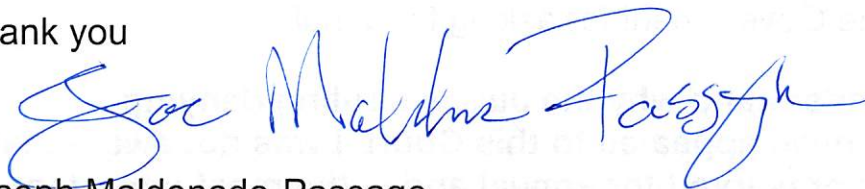
As to this day February 8th, 2021 I have never met my appeal attorney Brandon Sample and have only spoken on the phone for about 10 minutes at a time 3 times in this year long period. Until 10 days ago I have never been able to even sit down with any legal defense of mine

and look at any discovery material. I have never been allowed to review the discovery in my case, the briefs or the trial transcripts.

During this entire year I have been kept separated from the rest of the population of the prison to avoid me talking to the press or telling my story to the truth as what really happened so the prison has always used the excuse that because of where I have been kept I am not allowed visits with any family and just now started allowing me to meet with any legal staff just 10 days ago, so I am asking the court if you would allow me to appeal and brief to address the issue that the cases should have been severed because the wildlife charges had nothing to do with the murder for hire charges other than for the Government to parade half rotten heads of tigers around in front of the jury for the 5 days prior to even addressing Murder for Hire there for making the jury bias from the start.

I would appreciate your consideration and so you are aware I can provide documents if requested to validate every complaint and issue as to why I was not able to have contact with my attorneys.

Thank you

A handwritten signature in blue ink, reading "Joe Maldonado-Passage". The signature is fluid and cursive, with the first name "Joe" being particularly prominent.

Joseph Maldonado-Passage
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